

COUNTY OF LOUDOUN
DEPARTMENT OF PLANNING
MEMORANDUM

DATE: September 4, 2009

TO: Loudoun County Planning Commission

FROM: Judi Birkitt, Project Manager

SUBJECT: September 10, 2009 Planning Commission Worksession
Mount Hope Baptist Church SPEX 2007-0036

BACKGROUND

The Planning Commission held a public hearing on the above-mentioned application on July 16, 2009. Nine members of the public spoke regarding the application. Six spoke in favor, and three did not oppose the application but expressed concerns regarding (1) eliminating Mount Hope Road as a public access point to the Beaverdam Reservoir, (2) protecting the Beaverdam Reservoir, (3) the continued use of pump and haul, and (4) understanding how the future expansion of Belmont Ridge Road would impact the Village of Waxpool development.

At the hearing, Staff advised the Commission that there were no staff issues and provided the Commission revised draft Conditions of Approval that reflected the Applicant's agreement to allow public access to the reservoir, to plant trees within areas of the 300-foot reservoir buffer, and to construct a shared use path in conjunction with the sanctuary phase. The Commission expressed concerns regarding needing additional time to review the revised conditions. Commissioners questioned why the draft Conditions did not include requirements for Energy Star interior lighting and appliances. Commissioners also discussed the need for additional information regarding sanctuary elevations and stormwater management. Staff responses to these questions are provided below under the discussion section of this memo.

The Planning Commission voted 6-3 (Robinson, Ruedisueli, and Maio—opposed) to forward the application to a worksession and requested that Environmental Review Team Staff prepare an updated referral and attend the worksession. ERT program manager, William Marsh, plans to attend and has prepared the attached updated referral. The Commission also requested a referral from the Goose Creek Scenic River Advisory Committee; it is attached.

DISCUSSION

1. **Abandoning Mount Hope Road.** In order to use the northern parcel for accessory uses, such as parking, Staff had previously advised the Applicant to abandon Mount Hope Road and to consolidate the two parcels. When a road is abandoned, that road is no longer a public right-of-way. In response to public opposition to abandoning Mount Hope

Road, Staff advised the Applicant to apply for a boundary line adjustment (BLAD) to dissolve the property line between the two subject parcels. This would allow the Applicant to build on the northern parcel while maintaining Mount Hope Road as a public access point to the Beaverdam Reservoir. The BLAD is a separate administrative review process that need not delay processing this special exception application. A Staff recommended condition would require lot consolidation prior to using the northern parcel for accessory uses.

2. **Right-of-way Reservation.** As recommended by VDOT and Staff, the SPEX Plat shows a right-of-way dedication at the northeast corner of the northern parcel for the future widening of Belmont Ridge Road and notes that the location is approximate, pending future roadway design. Staff acknowledges that this right-of-way reservation is located within a Chesapeake and Potomac Company utility easement, which is not a conflict.

Note that Staff has verified that the existing Belmont Ridge Road together with the existing right-of-way dedication provides adequate space for the 6 lanes recommended in the CTP plus a shared use path within the right-of-way on both sides of the roadway, and outside of the cemetery. Regarding the future alignment and expansion of Belmont Ridge Road as it would impact the Village of Waxpool, Staff has advised the HOA to address their questions and concerns directly with the County Office of Transportation and VDOT, as the matter is separate from this application.

3. **Reforestation the 300-foot Reservoir Buffer.** Section 5.320.D.7 of the Facilities Standards Manual states, "All development shall provide a minimum 300-foot separation from the existing or planned shoreline of the impoundment area of any public drinking water reservoir to any land disturbing activity. . ." The proposed Special Exception Plat (SPEX Plat) provides this *required* 300-foot separation. The Revised General Plan states that "a distance of 1,000 feet east from the Beaverdam and Goose Creek reservoirs is designated as a priority open space area for the *voluntary* creation of a greenbelt" (Policy 1, p. 6-9). This particular property is not conducive to establishing a voluntary 1,000-foot buffer. Therefore, Staff referrals and draft conditions originally suggested planting trees within 0.8 acres of bare areas within the 300-foot buffer in lieu of providing the additional voluntary buffer.

After learning that the recommended planting area was the only flat portion on the church property where children could play, Staff met with the Applicant to discuss other options for protecting water quality while allowing the continued use of the play area. The Applicant agreed to a draft condition that would require planting trees 25 feet deep within a portion of the bare areas within the 300-foot reservoir. The portion is located on the north and west property lines of the southernmost projecting portion of the southern parcel. Given the existing mature tree cover between the subject property and the reservoir, together with the proposed Tree Conservation Areas and the recently strengthened FSM stormwater standards, Staff finds the Applicant's proposal to be a reasonable solution to protecting water quality. Staff recommends that the SPEX Plat be revised to depict this planting area prior to submission to the Board of Supervisors for review.

4. **Stormwater Management.** The Commission questioned why stormwater management facilities are shown on the SPEX Plat but are not reviewed during the legislative process. An underground SWM/BMP facility is shown on the SPEX Plat and is accompanied by a note that it is subject to site plan review. The Department of Building and Development reviews *detailed* stormwater management calculations and engineering drawings during the site plan review process.

A special exception application does not require depicting the location or type of stormwater facilities on the SPEX Plat. Given the proximity of this particular project to the Beaverdam Reservoir, during the referral process, Staff requested information on the *general* stormwater management approach in order to evaluate whether the special exception would impact water quality, so that conditions of approval could be included to address water quality impacts, if needed. For clarity, Staff has added a recommended condition stating that notwithstanding the underground facility shown on the SPEX Plat, all proposed stormwater management facilities are subject to review and approval at time of site plan.

5. **Connecting to Public Sewer.** The Board of Supervisors has approved a request by the Applicant for a pump and haul. The October 7, 2008 approval included a condition that the property be connected to public sewer when it becomes available and is within 300 feet and that the connection occur before construction of the proposed sanctuary. The draft Conditions of Approval for this application restate the Board's condition.
6. **Green Building Practices.** Commissioners questioned why the draft Conditions of Approval did not include Energy Star certified interior lighting and appliances or other green building practices. When the Environmental Review Team (ERT) referral for this application was prepared on October 29, 2007, Staff had not yet begun making recommendations for green building practices during the referral process. Based on general Revised General Plan policy guidance promoting energy efficiency, Staff currently strives to consistently ask applicants during the referral process to incorporate green *building* practices beyond existing land planning energy efficiency policies. Other than state building codes that require energy efficiency measures during the building permit process, the County has no regulatory ordinance requirements to compel Applicants to incorporate green building practices. Therefore, should the Applicant choose not to incorporate green building practices, Staff does not carry the matter forward as an outstanding issue.
7. **Architectural Elevations.** Review of a special exception application includes giving reasonable consideration to whether the proposed use is compatible with neighboring uses. To facilitate this review, the submission checklist for a special exception application includes submitting elevations for the front, sides, and rear of any proposed structures. In practice, applications have been accepted as complete without elevations. Elevations are often submitted if requested during the referral process, which is the case with this application. The Applicant submitted side elevations for the two buildings that are planned for the first two phases—the buildings to the northwest and southwest of the existing building. Because the Applicant does not anticipate constructing the sanctuary for 15 to 20 years, the Applicant finds it economically unfeasible to hire an architect to prepare the drawings. The SPEX Plat indicates that the sanctuary will be 1½ stories plus the steeple.

Steeple is exempt from the height limitation per Section 1-103.D(2) of the Revised 1993 Zoning Ordinance. The Applicant will be required to comply with the maximum 40-foot building height within the R-1 zoning district.

Review of a special exception application also includes giving reasonable consideration to whether the special exception will result in the preservation of a historic resource. The requested special exception will result in the preservation of the existing 1899 Mount Hope Baptist Church building, which a 1982 Virginia Historic Landmarks Commission (VHLC) Survey documented as one of the County's largest historic wood framed churches.

The existing building is not listed on the National Register of Historic Places or on the Virginia Landmarks Register and is not a County-administered historic district. Even if it were, the federal and state registers are honorary listings and do not offer any federal, state, or County regulatory protection of the properties listed on the registers. The only regulatory tool that the County has for protecting its historic resources is through the creation of Historic District Zoning Overlays (historic districts), which triggers Historic District Review Committee (HDRC) review.

There are no ordinance requirements for the protection or architectural design review of historic properties located outside of a County historic district, such as Mount Hope Baptist Church. Protection of these historic resources is largely negotiated during the legislative review process through voluntary proffers or agreed-upon conditions of approval that are based on the policy guidance of the Revised General Plan (RGP) and the Historic Preservation Plan (HPP).

The RGP sets forth the County's vision and commitment to preserving and enhancing its Elements of Green Infrastructure, which include heritage resources, such as the existing 1899 structure on the subject property. The HPP recommends specific strategies for preserving historic standing structures, such as Mount Hope Baptist Church. The application is consistent with HPP policies to preserve the original use of the historic structure and to protect the viewshed from at least one point on the public right-of-way (The viewshed is defined as the foreground of the primary structure to the public right-of-way that serves as the primary access to the site.). Regarding architectural compatibility, the HPP recommends considering building mass and height, building orientation, roof form, architectural detailing, choice and color of materials, size, shape, and proportion of entrance features, and number, placement, and proportion of doors and windows. To address compatibility, in lieu of providing elevations for the future sanctuary, the Applicant agrees to a draft condition intended to achieve compatibility.

Regarding the Commission's questions on Section 106 review, it does not apply to the subject property. Section 106 applies to some properties that are listed or eligible for listing on the National Register of Historic Places. If a proposed project is an undertaking by a federal agency or a recipient of federal funds or federal permits, Section 106 review is required. Using the Bluemont Grain Elevator telecommunications application as an example, the requirement for a Federal Communications Commission (FCC) permit triggered Section 106 review. Section 106 review is not required for this application, because the property is not listed or eligible for listing on the National Register of Historic

Places, a federal agency is not undertaking the project, and the project does not require federal funding or permits.

8. **Buffers and Setbacks along Property Frontage.** The Commission asked for clarification on the various minimum required landscape buffers, setbacks, easements, and trails required at the front of the property from the centerline of Belmont Ridge Road. The following are located concurrently along the frontage of the subject property measured from the ultimate right-of-way boundary of Belmont Ridge Road:

Yard	35 feet
Buffer Yard	20 foot
Parking Setback	75 feet
Building setback	100 feet
Conservation easement	5 feet, variable (northern parcel only)

A possible 8-10 foot shared use path within a 12-14 foot easement could be located within the right-of-way between the current centerline and the property line, pending future design of Belmont Ridge Road.

9. **Bike and Pedestrian Paths.** The Planning Commission asked how Staff reviews bicycle and pedestrian pathways and their connections to existing or missing pathways. Staff reviews these on a case by case basis using the Bicycle and Pedestrian Mobility Master Plan (Bike/Ped Plan) as a general guide and in conjunction with the Revised Countywide Transportation Plan (CTP) and the Revised General Plan. The Bike/Ped Plan states the County's vision and commitment to providing bicycle and pedestrian mobility and connectivity throughout the county, but allows for design flexibility in achieving this objective. The Bike/Ped Plan bases bike and pedestrian pathway design on a roadway's classification, Level of Service targets, the Revised General Plan policy area, and existing conditions, such as how much right-of-way is available along the frontage of the particular site.

For the subject application, Belmont Ridge Road is a minor arterial. For minor arterials, the Bike/Ped Plan recommends a 5-foot wide on-road bicycle lane and either a 6-foot sidewalk or an 8-foot shared use path. The bike lane and shared use path or sidewalk would be separated with a 5-foot planting strip. For properties within the Suburban Policy Area, the Bike/Ped Plan recommends sidewalks or shared use paths on both sides of Belmont Ridge Road but allows flexibility based on the site.

Regarding the timing for bike/ped improvements, the Bike/Ped Plan recommends constructing the improvements when the existing roadway is upgraded. The timing and design for Belmont Ridge Road's widening is unknown, therefore, Staff included a recommended condition that would require the Applicant to submit a bicycle and pedestrian design and development program to the Office of Transportation Services prior to submitting the initial site plan for the 600-seat sanctuary and to construct the improvements in coordination with the future widening of Belmont Ridge Road.

STAFF RECOMMENDATION

Staff recommends approval subject to the attached conditions. There are no outstanding Staff issues.

DRAFT MOTIONS:

1. I move that the Planning Commission forward SPEX 2007-0036, Mount Hope Baptist Church, to the Board of Supervisors with a recommendation of approval subject to the attached Conditions of Approval dated September 4, 2009 and based on the attached Findings for Approval.

OR

2. I move that the Planning Commission forward SPEX 2007-0036, Mount Hope Baptist Church, to a future worksession for discussion.

OR

3. I move that the Planning Commission forward SPEX 2007-0036, Mount Hope Baptist Church, to Board of Supervisors with a recommendation of denial based on the following Findings for Denial:

Attachments

1. Vicinity Map
2. Findings for Approval
3. Conditions of Approval dated September 4, 2009
4. Environmental Review Team Referral, September 4, 2009
5. Goose Creek Scenic River Advisory Committee, August 6, 2009
6. SPEX plat revised through March 4, 2009

VICINITY MAP



Directions: From Leesburg, proceed east on Route 7 to Belmont Ridge Road (Route 659). Turn right onto Belmont Ridge Road. The site is on the right, beyond Waxpool Road.

FINDINGS FOR APPROVAL

1. The proposed Special Exception application complies with the applicable requirements of the Revised 1993 Zoning Ordinance.
2. The proposed Special Exception for the expansion of an existing church use, subject to the recommended Conditions of Approval, is consistent with the land use policies of the Revised General Plan.
3. As conditioned, the special exception use will mitigate traffic impacts consistent with the Revised Countywide Transportation Plan.
4. As conditioned, the request is consistent with the Bicycle Pedestrian Mobility Master Plan.
5. As conditioned, the proposed Special Exception is consistent with the Historic Preservation Plan.

CONDITIONS OF APPROVAL (September 4, 2009)

1. Substantial Conformance. The approved Special Exception church use shall be developed in substantial conformance with the Special Exception Plat, consisting of eight (8) sheets dated June 8, 2007, as revised through May 1, 2009, and prepared by Robson Group Architects (the "SPEX Plat"), subject to these conditions of approval. Approval of this application for Tax Map #s /78////////13/ (PIN # 156-15-9668 and /78////////12B (PIN # 156-25-8201 (the "Property") shall not relieve the Applicant or the owners of the Property from the obligation to comply with and conform to any Zoning Ordinance, Codified Ordinance, or applicable requirement. As used in these conditions, (a) "Applicant" includes the owner of the Property subject to this Special Exception approval, its successors, and parties developing, establishing or operating the approved Special Exception Uses.
2. Lot Consolidation. Sheet 8 of the Special Exception Plat depicts a phase of development that shall not occur until the Property is consolidated into one parcel, which will allow accessory church uses as shown on Sheet 8.
3. Public Access. The Applicant agrees to allow public access across the Property via the prescriptive easement (Mount Hope Road), which is maintained by VDOT, in order for the public to access the Beaverdam Creek Reservoir.
4. Tree Save Areas. The following trees shall be designated as Tree Save Areas or Individual Trees Save trees:
 - a. Trees that are located within the 300-foot reservoir buffer as depicted on sheet 8 of the Special Exception Plat and labeled as "undisturbed area", including individual trees #3, 4, 5, 6, 7, 8, 9, and 10, which are located within the 300-foot reservoir buffer.
 - b. Individual Tree Save trees #1, 11, 15, 16, 17, 18, and 19 on Sheet 4 of the SPEX Plat (labeled "Tree Survey Exhibit").
 - c. The Tree Save Area depicted on Sheet 4 of the SPEX Plat (labeled "Tree Survey Exhibit") on the southern portion of Parcel 13, with the exception of the 5 trees that are in poor condition (# 20, 21, 22, 23, and 24).

Boundaries of all Tree Save Areas and Individual Tree Save trees shall be delineated on the site plan for each phase of the development. The site plan for each phase of the Property shall contain a note stating that the removal of trees within a Tree Save Area or Individual Tree Save trees is prohibited except in accordance with the provisions outlined in this note. Individual Tree Save trees and trees within Tree Save Areas shall be preserved, provided, however, that trees may be removed outside of the 300-foot reservoir buffer to the extent necessary for the construction of trails and Stormwater Management Facilities that are required pursuant to the Special Exception Conditions or

shown on the approved site plans as lying within such Tree Save Areas and for the construction of utilities necessary for development of the Property.

Removal of Individual Tree Save trees or trees within Tree Save Areas is prohibited except as necessary to accommodate Forest Management Techniques performed by or recommended by a professional forester or certified arborist, that are necessary to protect or enhance the viability of the canopy may be undertaken. Such Management Techniques may include, without limitation, pruning and the removal of vines, invasive species, trees uprooted or damaged by extreme weather conditions, and trees or limbs that are diseased, insect-infested, dead, or are considered a hazard to life or property.

If, during construction on the Property, it is determined by the Applicant's certified arborist and/or the County that any healthy tree located within the boundaries of any of the Tree Save Areas or any Individual Tree Save tree has been damaged during construction and will not survive, then, the Applicant shall remove each such tree and replace each such tree with two (2) 2½ - 3 inch caliper native, non-invasive deciduous trees. The placement of the replacement trees shall be proximate to the area of each such damaged tree so removed, or in another area as requested by the County.

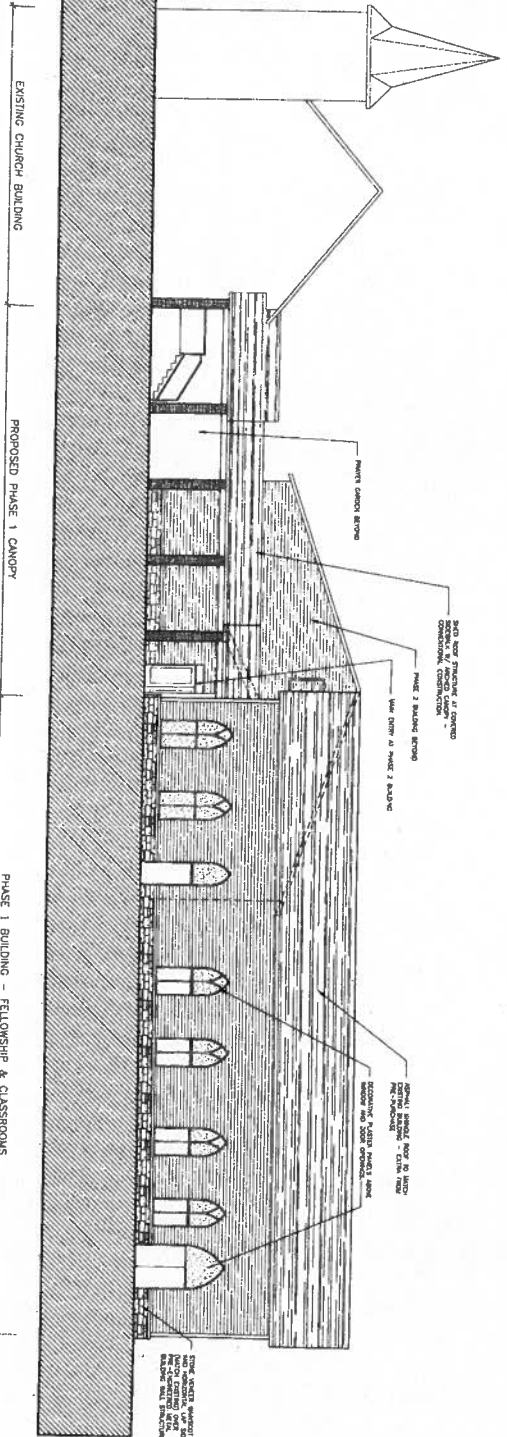
5. Reforestation. Prior to site plan approval, the owner shall submit a planting plan for a twenty-five foot deep portion of the 300-foot reservoir buffer located on the west and northwest rear property lines of Parcel 13, as depicted on the SPEX Plat for review and approval by the County Urban Forester. The plan shall incorporate three-gallon, containerized, native, deciduous trees planted at a density of 300 trees per acre on a 12-foot by 12-foot staggered grid. The planting plan shall be implemented within one year following site plan approval. In the event that a targeted stocking of 75 percent survival with uniform distribution is not achieved within one year, the Owner shall provide supplemental planting to achieve the targeted stocking. The reforestation area shall be included in and subject to the restrictions of the Tree Save Area.
6. Traffic Impact Analysis. Prior to submission of the initial site plan for the 600-seat sanctuary, the Applicant shall submit an updated Traffic Impact Analysis to the Office of Transportation Services for review and approval. The Applicant shall construct the improvements recommended in the Traffic Impact Analysis prior to receiving an occupancy permit for the sanctuary, and such improvements shall be at no cost to the County or the Virginia Department of Transportation (VDOT).
7. Right-of-way Dedication. Prior to submission of the initial site plan for the portion of the Property located north of Mount Hope Road, the Applicant shall dedicate right-of-way at the frontage of Belmont Ridge Road in an amount, location, and design approved by VDOT.
8. Bicycle and Pedestrian Mobility. Prior to submission of the initial site plan for the 600-seat sanctuary, provided that there is adequate space on the property adjacent to Belmont Ridge Road as determined by the County or VDOT, the Applicant shall submit a bicycle and pedestrian design to the Office of Transportation Services for review and approval. The Applicant shall construct bicycle path or a shared use path/sidewalk prior to receiving an occupancy permit for the sanctuary, or when there is a sidewalk to connect to on the abutting properties to the north or south (on the west side of Belmont Ridge Road),

whichever occurs first. Such path and improvements shall be at no cost to the County or the Virginia Department of Transportation (VDOT).

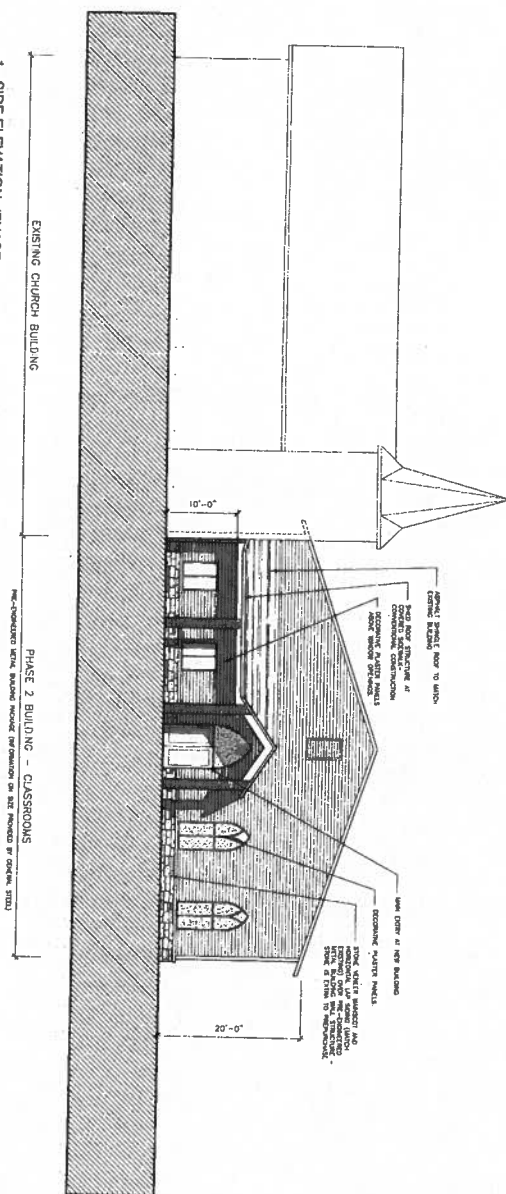
9. Public Sewer. The Property shall be connected to public sewer either (a) prior to commencing construction of the sanctuary or (b) when public sewer becomes available within 300 feet of the Property, whichever occurs first.
10. Stormwater Management Facilities. Notwithstanding the stormwater management facilities depicted on the SPEX Plat, all proposed stormwater management facilities are subject to review and approval at time of site plan.
11. Lighting. Exterior building lighting and parking lot lighting shall be full cut-off and fully shielded and shall direct light downwards and into the interior of the Property and away from surrounding public roads and properties.
12. Building Design. To ensure that the proposed buildings, building additions, and enclosed covered walkways are visually unobtrusive from adjacent properties, such buildings, building additions, and enclosed covered walkways shall be consistent with the existing 1899 primary structure in color, materials, design, and architectural features, as shown on the elevations in Exhibit A. For purposes of these conditions, consistent means that the new structures' materials and colors need not exactly match the existing primary structure but shall blend with the existing primary structure and that the design of the new structures shall not copy the existing primary structure but shall reference or repeat some of the architectural features of the existing primary structure (i.e., one or more of the following: window details, siding details, doors, roof color, roof materials, roof pitch and roof form).

Note: The Applicant has agreed to provide a one time fire and rescue contribution to the County in the amount of \$0.10 per square foot of non-residential floor area construction for equal distribution between the primary volunteer fire and rescue servicing companies. This contribution shall be made at the time of issuance of the applicable zoning permits. This contribution shall escalate annually from the base year of 1988 and change effective each January 1st thereafter, based on the Consumer Price Index (CPI).

SIDE ELEVATION (PHASE 1 & 2)
SCALE: 1/8" = 1'-0"



1. SIDE ELEVATION (PHASE - 2)
SCALE: 1/8" = 1'-0"



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REVISIONS:
A-2.0

PROJECT:
MOUNT HOPE BAPTIST CHURCH
PROPOSED SPEX
CPIN # 156-159-088 & 156-256-201
42507 Mount Hope Road, Ashburn, Virginia 20146

Robson Group Architects
Architects
14400 Eagle Run, Suite 200
Ashburn, Virginia 20146
(703) 876-0073

SEAL:
Architect
Interior Design

Exhibit A

DEPARTMENT OF BUILDING AND DEVELOPMENT

COUNTY OF LOUDOUN

MEMORANDUM

DATE: September 4, 2009

TO: Judi Birkitt, Planning Project Manager

FROM: William Marsh, Environmental Review Team Leader

SUBJECT: **SPEX-2007-0036 Mt. Hope Baptist Church – 3rd**

The Environmental Review Team (ERT) has reviewed three questions posed during a Planning Commission public hearing regarding this application. Answers to the questions are as follows:

Why is stormwater management not specified on the SPEX plat and why is an underground facility shown when the County does not recommend such facilities?

- 1) Sheet SPEX-1, dated June 8, 2007, and last updated May 1, 2009, depicts two possible stormwater facilities, likely a pond facility to the south and underground facility north of that. During review of this application, the Facilities Standards Manual (FSM) was updated to require stormwater measures stricter than minimum state requirements for areas draining to the Goose Creek Reservoir, including this site (see FSM Section 5.320.D.7). ERT believes that there is sufficient space within the proposed development area to implement appropriate stormwater measures and that said measures can be reviewed during site plan process. Appropriateness of underground facilities may be reviewed then, too. The stormwater ordinance, Section 1096, has recently been updated to address prior staff concerns about maintenance expenses of underground facilities.

Will ERT staff explain rationale for why the revised reforestation plan for the reservoir buffer is adequate?

- 2) The reforestation commitment described in condition of approval 5 evolved from discussions about addressing the 1300-foot voluntary reservoir buffer (Green Infrastructure Policy 1, Chapter 6, Revised General Plan.) Staff recommended adding forest cover in the open field on the west/northwestern property boundary. The applicant described an ongoing recreational use in this area and that no construction is proposed with the special exception. The 25-foot reforestation buffer is a compromise to add forest cover adjacent to the 300-foot reservoir buffer while maintaining the recreational use. For clarity, ERT recommends that the special exception plat depict the reforestation area prior to consideration by the Board of Supervisors.

Why are there no LEED conditions like Heritage Baptist Church {SPEX-2008-0053}

- 3) The Heritage case was introduced about a year after the Mt Hope case, during which time staff gained familiarity with green building standards and began making recommendations during case review. Heritage Church has committed to installing Energy Star rated appliances, including interior lighting, dishwashers and refrigerators. On August 31, 2009, ERT staff discussed energy conservation options with the applicant's representative and forwarded an Energy Star document: "Putting Energy into Stewardship: Energy Star Guide for Congregations," available at http://www.energystar.gov/index.cfm?c=small_business.sb_congregations .

Because the Revised General Plan is silent on energy conservation for non-residential development, applicants and county staff have no common plan policies upon which to discuss and agree to energy efficiency and many other green building goals.

Please contact me if you need any additional information.

The Goose Creek Scenic River Advisory Committee

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August 5, 2009



Ms. Judi Birkitt, Project Manager
Loudoun County Planning Department
1 Harrison Street, S.E., 3rd Floor
P.O. Box 7000
Leesburg VA 20177-7000

In re SPEX 2007-0036, Mt. Hope Baptist Church

Dear Ms. Birkitt:

The Goose Creek Scenic River Advisory Committee appreciates the opportunity to comment on this application. We appreciate that the applicant has agreed to the 300 foot no-disturbance buffer from the Beaverdam Creek Reservoir. It is also noted that any changes in the trees/removal or replacement will be with the guidance of the County Forrester.

Although it is not mentioned, we would suggest that any paths or trails built in this easement be of rustic or no material and intended for the serious hiker, with trails for animals located outside of the buffer, as is the official Policy of our Committee. This is also the manner in which the County Parks and Recreation Department would manage a trail program within the scenic easement.

Please keep us apprised of other referrals and/or information that may affect Goose Creek scenic beauty or water quality in regard to this project. As information is developed, we reserve the right to bring any further comments to your attention.

Sincerely,

Helen E. Casey, Chairman

cc. Goose Creek Scenic River Advisory Committee

Chairman
Helen E. Casey

Vice-Chairman
Joan G. Rokus

Board
Steven Combs-Lafleur
Kurt Erickson
William D. Hudspeth

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Frederick M. Crabtree